

1 MS. LAWS: Well, it actually says
2 "Policy."

3 MR. WHITCOMB: Not the part where
4 it says "Purpose."

5 MS. LAWS: Right. I'm actually
6 referring to the policy paragraph.

7 Q. Does that say "Policy" just as a
8 heading?

9 A. Yes.

10 Q. Okay. Thank you. So I'm going to
11 direct your attention to that paragraph.

12 A. Okay.

13 Q. It's Ohiohealth associates have the
14 opportunity to apply for transfers to other
15 positions within the department/facility/system
16 that support their personal and professional
17 goals." Did I read that correctly?

18 A. Yes.

19 Q. So Ohiohealth employees could
20 transfer to any facility within the system?

21 A. Yes.

22 Q. Earlier you identified several
23 Ohiohealth facilities for me. How many total
24 facilities comprised the Ohiohealth system?

25 A. Including all outpatient rehab

1 sites, approximately 50.

2 Q. Fifty?

3 A. Yeah.

4 Q. And I know you mentioned one
5 that's, I think you said it was in Athens?

6 A. O'Bleness.

7 Q. Other than O'Bleness, are most of
8 the -- are the 50 other facilities or
9 approximately 50 facilities in the Columbus
10 area?

11 A. Majority of them is in central
12 Ohio. MedCentral is in Mansfield.

13 Q. And If I wanted a list of all the
14 Ohiohealth facilities, where would I find that?

15 A. ESource, our intranet.

16 Q. Any other locations?

17 A. I'm sure there's documents,
18 advertising documents and those type of things
19 that have all the facilities listed.

20 Q. Earlier, we talked about some of
21 the facilities and the hours of operation at
22 those facilities. If an employee wanted to
23 find out the hours of operation for the
24 facilities, is there a document or documents
25 that the employee could access?

1 Q. Actually, before I direct your
2 attention to Plaintiff's 1, I just want to be
3 clear, is it Ohiohealth's position through you
4 as the 30(b)(6) designee that employees who do
5 need a reassignment as a form of reasonable
6 accommodation, if the job was already posted
7 they still have to compete with the other
8 candidates, correct?

9 A. That's correct.

10 Q. If they are competing with the
11 other candidates how is it seeking a reasonable
12 accommodation?

13 A. Ohiohealth gives the person who
14 needs an accommodation as a transfer, they give
15 them a lot of extra tools that other people are
16 not given. They are given the workplace
17 accommodation person. The workplace
18 accommodation person actually calls the manager
19 and gets the interview set up, instead of them
20 having to get through resumes being pulled or
21 not pulled. They actually call the manager and
22 set up the interviews for them.

23 And they will help the associate if
24 they need help getting prepared for the
25 interview. So they give them additional help.

1 A. Recruiters, yes.

2 Q. Is there a list of employees who
3 are displaced that is provided to the
4 recruiters?

5 A. I don't know if there's an actual
6 list.

7 Q. So short of a list they would only
8 know from general knowledge?

9 A. Yeah. They would be notified if
10 there is a department that was downsized or if
11 there was associates that had been displaced.

12 Q. What about associates who are
13 seeking transfer as a form of reasonable
14 accommodation?

15 A. Nancy contacts the recruiters and
16 lets them know. And she also contacts other
17 recruiters to see what jobs are open throughout
18 the system.

19 Q. Well, that's Ms. Miller. What
20 about the other workplace accommodation
21 specialist? What's the general practice?

22 A. That is the practice. They will
23 notify the recruiter. They will notify
24 associate relations. And the recruiter that
25 they are working with is the person that finds

1 them a position. And they will also talk to
2 the other recruiters.

3 A certain amount of information
4 they can download off the website. But the
5 recruiters may know of more jobs that are
6 coming upon open because of other areas of
7 growth or development. So they will also let
8 the workplace accommodation specialist know
9 that these may be coming open.

10 Q. I'm sorry. When you say "they"
11 you're referring to the workplace accommodation
12 specialist has access to certain information
13 online, certain job openings online?

14 A. Correct.

15 Q. But the recruiter has insight into
16 jobs that may be coming available?

17 A. Correct.

18 Q. But the recruiters themselves
19 aren't going to be provided with an actual list
20 of these employees?

21 A. I don't believe they are.

22 Q. Just returning to that particular
23 section B, the second sentence in that
24 paragraph, "Human resources staff monitor
25 in-process transfer requests." What does that